

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

SPRINT NEXTEL CORPORATION,

Plaintiff,

v.

IBUY EXPRESS INC., WHOLESALE EXPRESS, INC., ATHIR ORAHA PATTO, NADINE MAWFEK PATTO, KOSAI SALIM SHAMOON, TROY PATRICK HAGGARD, JOSHUA MICHAEL HAGGARD, TAREK HASSAN BAZZI, and WILLIAM LOUIS JOHNSON,

Defendants.

CASE NO.: 2:11-cv-15431

MOTION TO FILE UNDER SEAL AND BRIEF IN SUPPORT

Plaintiff Sprint Nextel Corporation (“Sprint”), pursuant to Local Rule 5.3, hereby submits its motion to file certain documents under seal. In support, Sprint states that the due to the nature of the relief sought and the issues addressed in the filings submitted to the Court contemporaneously herewith, Sprint respectfully requests that these pleadings be filed under seal. Sprint further states that there are no other means available to protect its interests other than by sealing the pleadings.

WHEREFORE, Sprint requests that the documents being submitted directly to the Court, namely, Sprint's Motion and Memorandum of Law, be permitted to be filed under seal. A proposed order is attached hereto as Exhibit A.

LOCAL RULE 7.1(A) CERTIFICATION

Sprint respectfully submits that the nature of relief requested in the pleadings being submitted to the Court contemporaneously herewith, renders it impracticable to meet and confer prior to seeking relief from the Court, and thus requests to be relieved from such obligation.

Respectfully submitted this 26th day of March, 2014.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 26, 2014 a true and correct copy of the foregoing was electronically filed with the Clerk of Court using CM/ECF, which will send notification to the registered attorney(s) of record that the documents have been filed and are available for viewing and downloading.

/s/ Sonal Hope Mithani
Sonal Hope Mithani (P51984)
Attorneys for Plaintiff